

**REMARKS**

This is in response to the Office Action dated January 18, 2007. Claims 1-13 and 16-20 are pending.

Claim 1 now stands rejected under Section 103(a) as being allegedly unpatentable over Kubo (US 2002/0036740) in view of Kim (US 6,577,366) and Kim (US 6,342,876). The Office Action appears to contend that it would have been obvious to have modified Kubo to utilize the driving scheme of Kim '876, and that it would have been obvious to have used the pixel electrode structure shown on the front page of Kim '366 in the device of Kubo. This Section 103(a) rejection is respectfully traversed for at least the following reasons.

The alleged combination asserted by the Examiner would not result in LC domains with "radially-inclined orientation" over both the unit solid portions of the electrode and over the open regions as called for in claim 1. If Kubo was to be modified to use the structure shown on the front page of Kim '366 as alleged in the Office Action (which applicant believes would be incorrect in any event), then the claim still would not be met.

**First**, if the pixel electrode of Kubo were to take the form of the pixel electrode shown on the front page of Kim '366 in combination with aperture 15 in the counted electrode shown in Fig. 1B as taught by Kim '366, then the "additional liquid crystal domains in the plurality of open regions" called for in the last paragraph of claim 1 would *not* appear to have a "*radially-inclined orientation*" as required by claim 1. The electrodes 14 in Kim '366 in adjacent pixel regions are spaced apart too far, given the aperture 15 in the counter electrode, to cause additional LC domains in the open regions to have radially-inclined orientation as required by claim 1.

**Second**, given the shape of the aperture 15 in the counter electrode, any LC domains formed over the alleged unit solid portions 14 on the front page of Kim '366 would *not* have a "*radially-inclined orientation*" as required by claim 1. Thus, even the alleged modification to Kubo would not meet the invention of claim 1.

Claim 18 defines over the cited art in a similar manner.

It is requested that all rejections be withdrawn. All claims are in condition for allowance. If any minor matter remains to be resolved, the Examiner is invited to telephone the undersigned with regard to the same.

Respectfully submitted,

**NIXON & VANDERHYE P.C.**

By: 

\_\_\_\_\_  
Joseph A. Rhoa  
Reg. No. 37,515

JAR:caj  
901 North Glebe Road, 11th Floor  
Arlington, VA 22203-1808  
Telephone: (703) 816-4000  
Facsimile: (703) 816-4100